



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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November 2, 2000

Gayle McKeachnie  
Consultant for Ziegler Chemical & Mineral Corporation  
121 West Main Street  
Vernal, Utah 84078

Re: Review of Amendment Submission to Notice of Intention to Commence Large Mining Operations, Ziegler Chemical & Mineral Corporation (Ziegler), Cowboy #1 Shaft - North Vein (CBNV-1), M/047/013 (U-0115850), Uintah County, Utah

Dear Mr McKeachnie:

This letter is a review of the proposed Cowboy #1 Shaft mine project on the BLM federal lease U-0115850 in Section 3, T9S, R24E, SLBM. The Division has received and reviewed copies of the Ziegler submissions to Doug Koza of the BLM dated May 30, 2000, and August 11, 2000. This proposal has been categorized by the Division as an amendment to Ziegler's existing large mine operation. While it is not necessary to submit this proposal using the Division's "Notice of Intention to Revise Mining Operations" form, we have enclosed a copy of this form to assist you in satisfying the requirements of the Minerals Rules for such a proposal. The Division is aware that this proposal is subject to the NEPA process as required by the BLM, and we will coordinate our review with the BLM to the extent our rules will allow.

As a general comment relating to this latest proposal, and the current large mine operation notice of intention filed with the Division, we request that Ziegler consider using a different system to identify the various satellite mine sites within the large mine permit. One example of why a better system is needed is that presently Ziegler has a shaft in the Cottonwood area designated as C-1, while this latest proposal on the Cowboy vein is also designated as C-1. This duplication creates confusion when trying to identify specific sites within the large mine permit area. For clarification purposes, the Division has referred to this latest proposal on the Cowboy north vein as CBNV-1.

## DIVISION COMMENTS ON CBNV-1 AMENDMENT

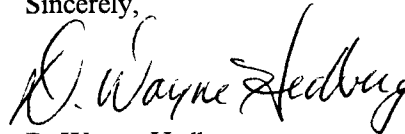
- The CBNV-1 project proposes work in an area where Division records are incomplete with respect to existing conditions. Please describe the current mining related disturbances within Section 3, and when these disturbances were last utilized. Please include a description of the current site

conditions (reclaimed features, sealed shafts, unreclaimed features, vegetated, etc.) in the project vicinity.

- Please confirm the disturbance at each of the escapeways at the Cowboy #1 South Vein site (CBSV-1) and the Cowboy #4 site (CB-4) as being 20 feet by 20 feet. Will there be a road disturbance along the vein providing access to each escapeway which should be included as part of this amendment?
- This proposal describes two possible closure designs for sealing the shaft openings with the final design to be approved by the Authorized Officer. The Division is in agreement with the general designs of the surface expression (rock outcrop and soil cover); however, information describing the actual shaft seal is lacking. Please provide a design drawing and description of the shaft seals. Please provide a third party cost estimate for installation of these shaft seals.
- This proposal describes final closure of the area where the surface pillar has been removed (old south vein mines) as including a 50 foot by 150 foot disturbance created by blasting the void shut. Please provide a third party cost estimate for this reclamation activity.
- Please provide a third party cost estimate for the remaining reclamation activities described in this proposal in addition to the shaft and vein closures. The Division can recognize price quotes from local contractors for equipment and tasks in your estimate. The Division generally uses unit costs from the Rental Blue Book and Means Heavy Construction Cost Data to verify reclamation estimates when price quotes are unavailable.

The Division will suspend further review of this amendment until your response to these review comments is received. It may be convenient to postpone a response to the Division's review to coincide with your response to BLM comments. If you have any questions regarding this review, please contact Doug Jensen at (801) 538-5382, or Tony Gallegos at (801) 538-5267.

Sincerely,



D. Wayne Hedberg  
Permit Supervisor  
Minerals Reclamation Program

jb  
enclosure: Form MR-REV  
cc: Chip Ziegler, Executive Vice President, Ziegler Chemical & Mineral Corporation  
Stan Wagner, Ziegler Gilsonite Mines  
Stan Perkes, BLM State Office  
Pete Sokolosky, BLM Vernal FO  
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